

EXHIBIT D

From: Doug Allen [REDACTED]
Sent: Monday, June 14, 2021 1:00 PM
To: Andrew Stebbins <astebbins@minclaw.com>
Subject: [REDACTED]

Hi Andrew,

It was recommended I reach out to you re the situation between [REDACTED] and Althea Azeff. It was also recommended I stay out of it because I have no horse in this race, and have absolutely zero to gain - other than being able to sleep at night.

Obviously you're under no obligation to keep this confidential. That said, I would request that courtesy for the benefit of all involved.

Althea shared with me information, part of which includes accusations [REDACTED] possibly committed serious crimes involving the George Sodini mass shooting at the Pittsburgh LA Fitness in 2009. Then Althea included me in a group email with [REDACTED] and [REDACTED] for the purpose of discussing [REDACTED] role in the Sodini case. [REDACTED] wanted nothing to do with it, nor did I. The emails reflect as much.

However, what Althea claims about [REDACTED] re the Sodini murders must be addressed.

In short, according to Althea, [REDACTED] called her frantically the night of the murders and told her he hacked into the killer's email accounts, found the receipts for the murder weapons, published the killer's murder blog, [REDACTED]. The entire narrative of Sodini's motive since has been based on this murder blog, and used to promote certain agendas ever since.

I mentioned to Althea that I have friends in Pittsburgh with ties to law enforcement, and forensic psychology, and said I could consult with them. Althea asked me to do so.

In summary, it was suggested that:

- **Both** Althea and [REDACTED] may have committed a variety of felonies relating to the Sodini murder story, most obviously [REDACTED] hacking into a killer's email and misrepresenting his proximity to the murders the night of the crime, as well as Althea's claim to having immediate knowledge of [REDACTED] alleged crimes and failing to report this to the police. [REDACTED]
[REDACTED] Possible other crimes suggested are obstruction of justice, accessory after the fact, aiding and abetting, misprision of felony, etc. You don't need a law degree to see the potential crimes committed if Althea's version of events is true.
- It was suggested I share this with you so you can take whatever actions are appropriate, and so I can be on record as having notified you, in good faith, of the potential crimes that were committed. [REDACTED] and you're not a criminal attorney. That said, it was suggested that giving you this information is appropriate in light of the potential serious criminal allegations, and that the Sodini mass shooting, and Sodini himself, are both still topics of discussion - and especially since there were nine victims who survived the shooting and who presumably may still be living.
- It was also suggested that Althea's public claims that [REDACTED] has severe mental health issues, combined with her escalating public attacks on his personal character, are not only potentially severely damaging to [REDACTED] but may also reflect possible mental health issues Althea may be experiencing. Both of these elements may lead to unfortunate and serious risks for all involved. My request to you is that you take this into consideration and lean towards doing your best to de-escalate the conflict between the two. I understand that's not your job. I'm just requesting this as a courtesy.
- Finally, it was suggested that I report this to the appropriate law enforcement agencies, which I did, beginning with the FBI. This is not some ruse or threat, or legal posturing. I reported it to the FBI yesterday with full details, and provided your contact information, as well as [REDACTED] contact information since she included Althea's claims in her legal filings, and of course Althea and [REDACTED] contact information since it was requested by the FBI.

Like I said, I have no horse in this race. I want to have "clean hands" when all this comes out that I acted in good faith and did the right thing.

I was told all of this information about [REDACTED] and Sodini by Althea after she received your demand letter. She was so focused on the defamation case, and the [REDACTED] case, and "exposing" [REDACTED] that she, I believe, forgot how serious the allegations are that her son hacked into a mass killer's email the night of a murder, published the killer's "lone killer" motive, [REDACTED]
You just can't tell somebody that information like it's another bullet point in a litany of character flaws about [REDACTED] like having his girlfriend pay his rent. It's describing potentially multiple felonies in a mass murder case and accusing [REDACTED] of intentionally misleading the police the night of the murders about his own alleged role in the Sodini case. What do you do with that information? It's like being told he hacked into Adam Lanza's computer the day of the Sandy Hook shootings - then lied about living in Sandy Hook after publishing Adam Lanza's motives for shooting up the school.

If Althea is making this up about [REDACTED] it's horrible. [REDACTED]
[REDACTED]

I was also advised to cooperate in any potential criminal investigations, of which my only first-hand knowledge is what Althea told me. My preference is not to be included in any of the defamation case, or the bankruptcy case with [REDACTED] or the case with [REDACTED]. I know the defamation is serious, and I also know that you probably have enough without my statements or deposition.

I've attached a summary of findings as a courtesy. I'm providing this to you in the hopes that you can use this to help all parties resolve their differences, and move forward productively, not destructively.

Please acknowledge receipt.

Best regards,

Doug Allen

P.S. I have not shared this email or this summary report with anybody involved in the litigation, including Althea, nor do I plan to. I only shared it with you because it was strongly recommended I do so.



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Summary Report – Althea Azeff [REDACTED] June 14, 2021

Overview

Althea Azeff initiated contact by email and phone on May 29, 2021, in response to receiving a demand letter from Minc Law, an anti-defamation law firm representing Ms. Azeff's adult son, [REDACTED]

Ms. Azeff claimed her son, [REDACTED] was the "Canadian hacker" in the George Sodini murder case from Aug. 4, 2009. Ms. Azeff further confirmed by email on June 9, 2021 that [REDACTED] called her in an unusual, manic/euphoric like state on the night Sodini murdered three women, and injured nine others at an LA Fitness in Collier Township, PA.

Ms. Azeff claimed:

- [REDACTED] hacked into Sodini's emails the night of the murders,
- [REDACTED] compiled Sodini's "murder diary" leading up to the night of the killings,
- [REDACTED] published the compiled "murder diary" on a new web page that night,
- Ms. Azeff suspected that the entirety of the "murder diary" could have been written by [REDACTED] that night,
- [REDACTED] was told by a reporter to claim he was a "Canadian hacker,"
- [REDACTED] lived 15 minutes from both Sodini, and the LA Fitness where the murders took place,
- [REDACTED] father, [REDACTED] was also an IT professional who could have known Sodini since Sodini worked in IT for K & L Gates in Pittsburgh.
- [REDACTED] had a background of managing online forums, e.g., [REDACTED] and gamer forums.
- [REDACTED] claimed to be the "Canadian hacker" who hacked into Sodini's emails and published Sodini's "murder diary."
- [REDACTED] provided print interviews using the name [REDACTED] and claiming to be the "Canadian hacker."
- That neither Ms. Azeff, [REDACTED] had ever contacted any law enforcement agency about [REDACTED] alleged illegal access to Sodini's emails.

Ms. Azeff was informed that there were professionals in Pittsburgh who could be consulted with about [REDACTED] and the Sodini murder case, and who could possibly give some insights. Ms. Azeff requested they be contacted. Those who read Ms. Azeff's letter written on behalf of [REDACTED], had one common question that stood out: "How would Ms. Azeff know how much her teenage son watched porn or masturbated to claim his [REDACTED] "backstory" was made up?"

When Ms. Azeff was emailed to ask her to clarify this, she said she would not answer that question by email – only by phone. This elevated the suspicion that Ms. Azeff was making this claim about [REDACTED] “backstory” being false strictly to be vindictive and harm [REDACTED] and [REDACTED] business.

This was further reinforced by Ms. Azeff herself when she declined to respond to questions by email, claimed [REDACTED] may have hacked her laptop and taken control of her browser, and then initiated a text conversation by the Telegram app, which Ms. Azeff believed was safe from [REDACTED] hacking.

This entire matter would be something ignored completely, except for the magnitude of the George Sodini mass shootings, and the possible felonies Ms. Azeff claims that both Ms. Azeff and [REDACTED] committed in relation to the Sodini murder case, according to Ms. Azeff herself.

Ms. Azeff’s allegation that [REDACTED] was the “Canadian hacker” describes events that are prima facie evidence of multiple Pennsylvania and Federal felonies carrying severe penalties committed by Ms. Azeff and [REDACTED] including, but not limited to:

- Unauthorized access to Sodini’s email accounts,
- [REDACTED] falsely presenting himself physically distanced from the crime scene when in fact [REDACTED] was in close physical proximity to the crime scene (15-minute drive),
- Tampering with evidence,
- Obstruction of justice,
- Interfering in a police investigation,
- Aiding and Abetting,
- **Ms. Azeff violation of 18 U.S. Code § 4 - Misprision of felony for not reporting [REDACTED] multiple alleged crimes.**

Ms. Azeff, if her allegations about [REDACTED] are true, also could potentially be charged with obstruction of justice, and aiding and abetting in first degree murder, depending on [REDACTED] level of involvement, if any, with Sodini or possible accomplices of Sodini. **There is no statute of limitations on any of these crimes involving first degree murder.**

This is a serious criminal matter which was shared with multiple 3rd-parties by Ms. Azeff in the course of what appear to be either her vindictive, or as Ms. Azeff claims, her virtuous efforts to “expose” her son’s criminal behavior and bad character.

Summary of Findings:

- **Ms. Azeff’s depiction of events relating to the George Sodini murders describe multiple prima facie felonies allegedly committed by both [REDACTED] and by Ms. Azeff for not reporting [REDACTED] alleged crimes to the police.**

- The public perception of Sodini's mass murders was, and still is, almost entirely derived by the alleged "murder diary" that Ms. Azeff claimed ██████ published. Both Ms. Azeff and ██████ may derive personal, legal and professional benefit from this narrative of the Sodini murders. This alone would be problematic, but taken in the context of ██████ business, Sodini's alleged "incel" lifestyle being the motive for the killings, Sodini's alleged masturbation habits described in the journal, and the public feud between ██████ being entirely centered around the porn vs. anti-porn debate, Sodini's crimes and "murder diary" take on an entirely different perspective in relation to ██████ and Ms. Azeff, and their potential motives and involvement in the crimes, including ██████ potentially destroying or manufacturing evidence that would have linked him or distanced him, or others, to or from Sodini, and the murders.
- It must be noted in this context that Ms. Azeff claims ██████ immediately, and illegally, inserted himself into the Sodini story as the lead investigator and reporter. Ms. Azeff claims ██████ proactively marketed his own self-appointed involvement in the story, and that Ms. Azeff failed to reveal ██████ true identity or involvement. According to Azeff's allegations, ██████ was not just an innocent bystander who witnessed Sodini's crimes. ██████, according to Azeff, decided to become a leading character, the "Canadian hacker," in the notorious story of a mass murder.
- If Ms. Azeff's claims about ██████ being the "Canadian hacker" are true, then ██████ gap in posting as ██████ on an online gaming forum from late July 2009 to October 2009, may be related to ██████ alleged hacking into Sodini's emails, and/or involvement in the Sodini murders beyond his alleged role as the "Canadian hacker."
- News stories online published by the Pittsburgh Post-Gazette and Philadelphia Inquirer both quote a person named ██████ who claimed to be the "Canadian hacker," ██████ Ms. Azeff made no effort or attempt to dissuade the news organizations, or police, of the "Canadian hacker" falsity.
- Ms. Azeff also claims that ██████ told her he discovered Sodini's receipts for the murder weapons the night of the murders, which may have interfered with the police investigation of the murders. Ms. Azeff, having a law degree, was fully aware of the criminal nature of these alleged acts, and her own criminal behavior in having knowledge of ██████ alleged felonies and not reporting them to the police.

- [REDACTED] included the “Canadian hacker” allegations against [REDACTED] in her legal pleadings. There were no legal pleadings found in which [REDACTED] denied he was the “Canadian hacker.”
- [REDACTED]
[REDACTED]
[REDACTED]
- The “murder journal” according to Ms. Azeff parallels [REDACTED] own life and personality, and is being used by Ms. Azeff and [REDACTED] as “proof” [REDACTED] knew about the connection between porn and violence towards women as far back as 2009.
- The public reporting of the George Sodini murders describes Sodini going to the rear exercise room of the LA Fitness, then walking to the back of the room, near an exit door, then turning off the lights before he began shooting. The proximity to the exit door and turning off the lights raises the question as to whether there may have been a second accomplice waiting outside, or whether Sodini opened the door to allow an accomplice to enter. There are reports that Sodini fired 52 shots from two handguns, that Sodini killed himself with a 3rd handgun, and that Sodini had a 4th handgun in his possession. If Ms. Azeff’s claim that [REDACTED] is the “Canadian hacker” is true, and that [REDACTED] immediately published the “murder diary” the night of the murders that describes Sodini acting alone and motivated exclusively by his lack of success with women, and his history of failures with women and porn, it raises the following questions:
 - Did [REDACTED] know Sodini?
 - Did [REDACTED] delete evidence connecting him to Sodini?
 - Did [REDACTED] fabricate evidence to distance himself from Sodini?
 - Was [REDACTED] an accomplice?
 - Did Ms. Azeff know that [REDACTED] knew Sodini?
 - Did [REDACTED] admit to Ms. Azeff being Sodini’s accomplice?
 - Did [REDACTED]’ father, [REDACTED], know Sodini?
 - Was there pre-knowledge of Sodini’s plan by [REDACTED], since the alleged “murder diary” described Sodini planning the crime months prior to the murder?
 - Did the Allegheny County police superintendent suspect others knew of Sodini’s plan when he publicly commented that anybody who knew about it had the responsibility to come forward?
 - Were Azeff and [REDACTED] aware that the police were requesting anybody with knowledge to come forward?
 - Did Azeff and/or [REDACTED] ever voluntarily approach the police with the information that [REDACTED] had gained access to Sodini’s emails?

- Did ██████ delete information in Sodini's emails, or from Sodini's social media or ██████ accounts?
 - Did Sodini have Reddit accounts?
 - Did ██████ gain access to Sodini's emails for the purpose of deleting Sodini's ██████ accounts, and/or private messages between Sodini and ██████, or other accomplices, on ██████?
 - Was Sodini a paying customer of ██████ ██████ business?
- **Ms. Azeff and ██████ both know there were nine victims of Sodini who lived through the shooting, and who may presumably still be alive today.** Yet Ms. Azeff and ██████, according to Ms. Azeff's claim that ██████ is the "Canadian hacker," are content with concealing from the victims that the person who published the "murder diary" is ██████, who lived 15-minutes from Sodini and the crime scene the night of the murders, ██████.
 - If Ms. Azeff's claims are true that ██████ is the "Canadian hacker," it is prima facie evidence of ***mens rea*** that **Ms. Azeff was intentionally aiding and abetting ██████ in the commission of at least one felony** (unauthorized access to a computer), and most likely multiple additional felonies, including obstruction of justice, tampering with evidence, and possibly first degree murder – depending on the facts of the case which ██████' allege access of Sodini's emails would have had the potential to hide.
 - Ms. Azeff has made repeated and vehement claims that ██████ has been diagnosed with severe mental health problems, owns an arsenal of guns, is misogynistic, and is a violent threat towards women. Yet Ms. Azeff is seeking to intentionally provoke and antagonize ██████, seemingly gratuitously through her involvement in the ██████ case, and through her own intentionally provoking response to the Minc Law demand letter, in the hopes that she would trigger ██████ "severe anxiety," including intentionally including the phrase "my boy" in her response to Minc Law. **This level of premeditated cruel treatment of somebody with what Ms. Azeff claims to know as having a diagnosed severe mental health problem is prima facie sadistic – especially coming from the mother – and suggest Ms. Azeff's true motivation is to hurt ██████**, and that Ms. Azeff may herself have severe mental health issues.
 - Ms. Azeff has written, and plans to publish a book entitled, ██████ which she has shared privately with 3rd-parties. It was requested that this book be looked at for references to George Sodini, and Azeff's claims that ██████ is the "Canadian hacker." Apparently, this book written by Azeff is filled with prima facie denigration of Mr. Rhodes' character, **but lacks any reference to the Sodini murders, or ██████ alleged role as the "Canadian hacker."** The same holds true for Ms. Azeff's letter and

statements on behalf of [REDACTED]. If this is true, it may be a glaring example of *mens rea* regarding Ms. Azeff's role in the cover-up of her adult son's alleged involvement in the Sodini murders. Why include every other derogatory accusation about Mr. Rhodes, and yet make the conscious decision to leave out what is a far more damning reflection of Mr. Rhodes character, his illegal activity, and involvement in the Sodini murder case?

Summary of Recommendations

- Encourage Ms. Azeff to get immediate professional psychological help.
- Share with appropriate professionals the findings of this report, including Minc Law.
- Minc Law, Ms. Azeff, and [REDACTED] may have ethical, moral, professional and legal obligations to act on these findings, especially in relation to the living victims of the Sodini shootings.
- Encourage [REDACTED] and [REDACTED] law firm to seek non-litigious resolution, family therapy, and professional mediation in the legal matters for the mental wellbeing of [REDACTED] and Ms. Azeff.
- Encourage Ms. Azeff to refrain from further personal and denigrating attacks on [REDACTED] – whether [REDACTED] actually has severe mental health issues or not, or whether she believes her opinions to be true or not.
- Encourage Ms. Azeff that she has no responsibility for actions taken by [REDACTED], nor does she have a moral, ethical or legal obligation to preemptively “protect” others, especially adult women, from [REDACTED].
- Ms. Azeff's infantilization of women (claiming they are not competent to make independent life choices, incapable of avoiding being manipulated by [REDACTED], and requiring their fathers to intercede in their lives to rescue them) whether intentional or not, is potentially psychologically harmful to Ms. Azeff herself, [REDACTED] and his relationships with women, and the women themselves. Encourage Ms. Azeff to become aware she is infantilizing women, and to encourage her to stop.
- If [REDACTED] does have severe mental health issues as Ms. Azeff claims, Ms. Azeff's vitriolic and persistent denigration of [REDACTED]' character will most likely make those issues worse, not better, and could lead to the harm of others.
- If [REDACTED] does not have severe mental health issues as described by Ms. Azeff, her vitriolic and persistent denigration of [REDACTED]' character may create mental health issues for both [REDACTED] and Ms. Azeff, alone or together, requiring extensive therapy.
- Encourage Minc Law, [REDACTED], and Ms. Azeff to voluntarily submit affidavits to law enforcement regarding both of their alleged roles and knowledge in the George Sodini murders.
- Fully cooperate in any future criminal investigation into [REDACTED] and Ms. Azeff.
- Be aware that failing to report to the police the knowledge of Ms. Azeff's admitted misprision of felony in the George Sodini murder case may be discovered during the

course of ██████' litigation with Ms. Azeff. It is highly likely, because of their own possible criminal culpability, that Ms. Azeff, ██████, and/or Minc Law hide the "Canadian hacker" allegations from the police. Therefore, it is recommended that these allegations be reported to both the Allegheny County police involved in the initial investigation, and to the FBI, since the alleged crimes include ██████ and Ms. Azeff's phone and email communications, and to representatives of the surviving victims.

- **Parties involved in any legal proceeding request written interrogatories from ██████ and Ms. Azeff relating to the Sodini murders.**

Conclusion:

Ms. Azeff's allegations regarding the roles Ms. Azeff and ██████ played in the Sodini murder story, dwarf what may be a petty "he said/she said," dysfunctional, meddling codependent mother/son relationship Ms. Azeff has, or had, with her son.

If Ms. Azeff's allegations are true about ██████ being the "Canadian Hacker," there is prima facie evidence of mens rea, which in turn could provide probable cause for law enforcement to investigate both Ms. Azeff and ██████ about their involvement in the Sodini murders, and their collaborative cover-up of what Ms. Azeff claims is ██████ role as the "Canadian hacker." At minimum, Ms. Azeff's accounts of the events on Aug. 4, 2009, is a prima facie admission to her violating 18 U.S. Code § 4 - Misprision of felony.

Azeff's self-described admission of misprision of felony is further amplified by the fact the ██████ business, and ██████ self-described backstory of his porn addiction at the time of the Sodini murders parallels the alleged "murder diary" of George Sodini – and that according to Ms. Azeff, ██████ lived 15-minutes from the murder scene the night of the murders and took it upon himself to be the lead investigator and reporter in the case.

If ██████ is the "Canadian hacker," and Althea Azeff knew of this since the night of the murders Aug. 4, 2009, the victims of the shooting have a right to be made aware of both of ██████ involvement, and Ms. Azeff's concealment of his involvement in the Sodini story.

Ms. Azeff's assertions that ██████ has a long pattern of criminal behavior, and Ms. Azeff's failure to report it to law enforcement, and only use these accounts to assist a 3rd-party for financial gain, means Ms. Azeff is either lying about ██████ and/or is admitting to her own guilt in failure to report ██████ and her own, alleged crimes.

Finally, if true, Ms. Azeff's and ██████ intent to deceive the police, and the victims of this crime, is abhorrent on its face. Ms. Azeff's attempt to use the victims of this tragedy in an exclusively vindictive and unsolicited attack on her son in ██████ legal case, with no regard to the surviving victims of the shooting and their families, may be a symptom of a deeper mental health pathology which must be evaluated by mental health professionals.



Defamation Removal Law
Online Reputation &
Brand Protection Lawyers

Andrew Stebbins
Managing Attorney
astebbins@minclaw.com

June 24, 2021

Via Email

Doug Allen

RE: *Althea Azeff Summary Report*

Dear Mr. Allen,

I am in receipt of your letter dated June 14, 2021. Our client has nothing to do with any illegal hacking or the 2009 mass shooting perpetrated by George Sodini. Any suggestion of such is a ridiculous and defamatory fairytale. To be abundantly clear, our client never hacked into or otherwise accessed the email account of Sodini. Our client has never accessed any private data of Sodini, including but not limited to web searches, emails, or receipts for firearms. Our client has never engaged in any kind of illegal hacking or computer intrusion against anyone, including Sodini or Ms. Azeff. Our client never created a website to host content of any kind related to this incident. Our client has never had any communication of any kind with Sodini. Our client never heard of Sodini until after the incident took place. Our client does not have any connection to Sodini whatsoever. Our client does not have any connection to the mass shooting incident whatsoever.

[REDACTED]

[REDACTED] This novel falsity comes after countless other false and defamatory statements purported by Ms. Azeff, including those included in her "statement" and book.

Further, Ms. Azeff's numerous other false and defamatory statements, including but not limited to that our client attempted to murder her, that our client attempted to murder numerous other people, and that our client is misogynistic and antisemitic and mentally unstable, are also false and defamatory. There is not any two-sided conflict between Ms. Azeff and our client, but an obsessive and one-sided campaign to interfere with and destroy our client's life. It is up to Ms. Azeff to cease and desist her tortious conduct, settle this matter, and leave our client alone to live his life in peace. To protect our client from further harm by Ms. Azeff, we do not have any choice but to move forward with filing our lawsuit and seeking court-ordered injunctive relief.

Like any right-minded Pittsburgh area resident, our client was horrified at the mass shooting when it occurred. Any suggestion of any connection between our client and this horrific mass shooting incident is utterly absurd, false, and defamatory. We will be including Ms. Azeff's latest defamatory statements in our complaint that we are soon filing in federal court. Please be sure to retain any and all communications

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with Ms. Azeff, [REDACTED] and [REDACTED], along with any other potentially relevant data for future subpoena.

Please feel free to reach out to me if you have any further inquiries or would like to discuss this further.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'AS', with a stylized flourish at the end.

Andrew Stebbins

ACS:dmb